

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:13-cv-00721-FL**

<b>MARIAN SNOW,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>DEFENDANT GLOBAL</b>
	)	<b>INTERNATIONAL’S MOTION TO</b>
<b>GLOBAL CREDIT AND COLLECTION</b>	)	<b>DISMISS COMPLAINT</b>
<b>CORPORATION; and GLOBAL</b>	)	
<b>INTERNATIONAL,</b>	)	
	)	
<b>Defendants.</b>	)	

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(5), Defendant Global International (“Global International”), by and through its undersigned counsel, appearing specially for the limited purpose of contesting personal jurisdiction and the purported service of process made upon it, and thereby preserving any and all defenses available under Fed. R. Civ. P. 12, hereby respectfully moves this Court for an order dismissing each and every one of the claims asserted against it in the Complaint filed by Plaintiff Marian Snow (the “Plaintiff”), with prejudice. In support of its Motion, Global International relies on its Memorandum of Law in Support of Motion to Dismiss Complaint, filed contemporaneously herewith.

As shown in Global International’s Memorandum of Law in Support of Motion to Dismiss Complaint, all of Plaintiff’s claims against Global International should be dismissed because Plaintiff has not properly served Global International with a copy of the summons and the Complaint. Indeed, despite rightly acknowledging in her Affidavit in Support of Plaintiff’s Request for Extension of Time for Service and the Reissuance of the Summons for Global International (DE 15-1) that personal service on Global International was necessary, Plaintiff nonetheless attempted to serve Global International via registered mail alone. Moreover,

Plaintiff's claims should also be dismissed because Global International is not subject to personal jurisdiction in North Carolina. Instead, Global International is a non-registered d/b/a of Global Credit, used primarily in connection with Global Credit's offices in Ontario, Canada. Global International does not conduct any business or commercial activities in North Carolina, nor has purposely established any contacts whatsoever with the state. For these reasons, the Court should dismiss all of Plaintiff's claims against Global International, with prejudice.

WHEREFORE, Global International respectfully requests that this Court dismiss all claims asserted against it in Plaintiff's Complaint, with prejudice. A proposed Order granting Global International's Motion to Dismiss Complaint is attached as **Exhibit "A"** hereto.

This 4th day of June, 2014.

Respectfully submitted,

s/ William J. Long

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Attorney for Defendants  
GLOBAL CREDIT AND COLLECTION CORPORATION  
AND GLOBAL INTERNATIONAL

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document via U.S. First Class Mail, on this the 4th day of June, 2014:

Marian Snow  
103 Nostalgia Ln  
Zebulon, North Carolina 27597

s/ William J. Long  
OF COUNSEL